

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION,

Case No. 1:24-cv-00902 (LJV)

Plaintiff,

**NOTICE OF MOTION TO ADMIT  
COUNSEL *PRO HAC VICE***

- against -

BOXWOOD HOTELS, LLC, d/b/a Holiday Inn Express, SANDALWOOD HOTELS, LLC, d/b/a Hampton Inn & Suites, STAR HOTELS, LLC, d/b/a La Quinta Inn, BRADFORD HOTEL LLC, d/b/a Holiday Inn Express Bradford, HAMBURG HOTEL LLC, d/b/a Holiday Inn Express & Suites, HAMBURG LODGING INC., d/b/a Hampton Inn Buffalo-Hamburg, FALLS HOTEL LLC, d/b/a Hampton Inn Niagara Falls/Blvd, and ROSEWOOD HOTELS LLC,

Defendants.

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TO: Counsel for Defendants

PLEASE TAKE NOTICE that upon the annexed declaration of movant in support of this motion and the enclosures annexed thereto, I, Allegra L. Fishel, will move this Court pursuant to Rule 83.1(d) of the Local Rules of the United States District Court for the Western District of New York for an order allowing the admission of movant, Founder and Executive Director of the Gender Equality Law Center and a member in good standing of the bar of the State of New York, as attorney *pro hac vice* to argue or try this case in whole or in part as counsel for anticipated representation of Plaintiff Dylan Bringuel. There are no pending disciplinary proceedings against Allegra L. Fishel in any state or federal court.

Dated: Brooklyn, New York  
February 18, 2025

**GENDER EQUALITY LAW CENTER**

*Allegra Fishel*

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*Anticipated Attorney for Plaintiff-Intervenor  
Dylan Bringuel*